

Joshua B. Swigart, Esq. (SBN: 225557)
josh@westcoastlitigation.com

Robert L. Hyde, Esq. (SBN: 227183)
bob@westcoastlitigation.com

Hyde & Swigart
411 Camino Del Rio South, Suite 301
San Diego, CA 92108-3551
Telephone: (619) 233-7770
Facsimile: (619) 297-1022

Abbas Kazerounian, Esq. (SBN: 249203)
ak@kazlg.com

S. Mohammad Kazerouni, Esq. (SBN: 252835)
mike@kazlg.com

Assal Assassi, Esq. (SBN: 274249)
assal@kazlg.com

Matthew M. Loker, Esq. (SBN 279939)
ml@kazlg.com

KAZEROUNI LAW GROUP, APC
2700 North Main Street, Suite 1050
Santa Ana, CA 92866
Telephone: (800) 400-6808
Facsimile: (800) 520-5523

Attorneys for the Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

Nicole Newman, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

Americredit Financial Services, Inc.,

Defendant.

Case Number: 11-CV-3041 DMS(BLM)

**NOTICE OF SETTLEMENT AND
JOINT MOTION TO VACATE ALL
CASE DEADLINES OCCURRING
PRIOR TO THE MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT
HEARING**

On August 15, 2012, and then again on August 27, 2012, the Parties participated in two all-day mediation sessions before Judge Leo S. Papas (Ret.). As a result of these two mediations a joint settlement, on a class-wide basis, has been reached in this action and another action pending in the Northern District of Illinois, entitled *Mack v. General Motors Financial Co., Inc.*, 11-CV-9008. The Parties are currently working in good faith to prepare the necessary settlement documents. Plaintiff anticipates finalizing all necessary settlement documents and filing her Motion for Preliminary Approval within roughly 60 days, by October 30, 2012. In anticipation of a hearing date on the Motion for Preliminary Approval within four weeks of October 30, 2012, the Parties respectfully request that the Court vacate all pending case deadlines occurring before October 30, 2012. Specifically, these pending case deadlines are as follows:

August 31, 2012: Expert exchange;

September 14, 2012: Plaintiff's motion for class certification;

September 21, 2012: Supplemental expert exchange;

October 26, 2012: Expert disclosures.

Respectfully submitted,

August 28, 2012

Hyde & Swigart

By: /s/ Joshua B. Swigart
Joshua B. Swigart
Attorneys for Plaintiffs

August 28, 2012

Goodwin Procter, LLP

By: /s/ Chad R. Fuller
Chad R. Fuller
Attorneys for Defendant

HYDE & SWIGART
San Diego, California

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Chad R. Fuller, counsel for Defendant, and that I have obtained Mr. Fuller's authorization to affix his electronic signature to this document.

Dated: August 28, 2012

HYDE & SWIGART

s/Joshua B. Swigart

Joshua B. Swigart

Attorneys for the Plaintiff

HYDE & SWIGART
San Diego, California